

August 27, 2018

The Honorable Andrew Wheeler
Acting Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20004

Sent via email: Wheeler.Andrew@Epa.gov

Dear Acting Administrator Wheeler:

On behalf of CropLife America (CLA), I would like to congratulate you on your leadership role in the Environmental Protection Agency. Understanding the many challenges you are managing, we write to ask you to support something very positive for agriculture. CLA writes to urge your support for the extension of post-emergence dicamba product registrations that currently are under registration review by EPA. Dicamba has proven to be a valuable tool for farmers as they seek to address the problem of herbicide resistant weeds.

CLA represents the developers, manufacturers, formulators and distributors of plant science solutions for agriculture and pest management in the United States. CLA's member companies produce, sell and distribute virtually all the vital and necessary crop protection and biotechnology products used by American farmers, ranchers and landowners. Every year, these companies expend millions of dollars in research and development activities to better steward their products to protect both human health and the environment. Our industry's technological development is the way forward for agriculture and for sustainable solutions to pest control in the US and globally.

We believe that the impending decision by EPA on the new dicamba formulation registrations beyond crop year 2018 is very important to the weed-management systems approach that is vital to US agriculture. The action by EPA to decide for these products for 2019—and hopefully longer—will provide the needed certainty for farmer planning, and industry commensurate decision making.

CLA is a member of the Pesticide Policy Coalition (PPC) which is submitting a letter about the renewal of the new formulation dicamba registrations—and our association fully supports the comments of the PPC and of the registrant.

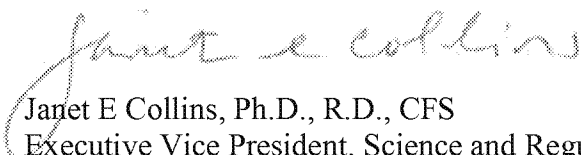
Weed control is one of the most overarching needs of modern agriculture—we know that the spread of weeds resistant to other herbicide modes of action means that a more comprehensive set of tools is even more critical to farmer planning and productivity. Literally hundreds of millions of dollars of productivity and farm profitability hinge on the ability to have multiple tools available in a modern weed management system so that weed resistance can be managed

effectively. Widespread adoption of the new herbicide formulations and their companion biotech traits by farmers in 2017 and 2018 shows the market need.

As with all new technologies, education and training in appropriate use of the tool is essential. Over decades of use of new technologies, farmers have demonstrated the practical reality of requisite on-the-ground stewardship in successful management of those technologies.

Thank you for considering these comments intended to support dicamba registrations and to remind that technological development is the core of sustainable agriculture in the United States.

Sincerely,

A handwritten signature in cursive script that reads "Janet E. Collins".

Janet E Collins, Ph.D., R.D., CFS
Executive Vice President, Science and Regulatory Affairs

cc:

Dr. Nancy Beck

Mr. Rick Keigwin